

EXHIBIT A

EXHIBIT A

Received for Filing Oakland County Clerk

FILED

Approved, SCAO

Original - Court
1st copy - Defendant2nd copy - Plaintiff
3rd copy - Return

STATE OF MICHIGAN		CASE NO.
6th	JUDICIAL DISTRICT JUDICIAL CIRCUIT COUNTY PROBATE	SUMMONS
Court address 1200 N. Telegraph Road, Pontiac, MI		Court telephone no.
Plaintiff's name(s), address(es), and telephone no(s). Josephine Slappey		Defendant's name(s), address(es), and telephone no(s). Target Corporation
Plaintiff's attorney, bar no., address, and telephone no. Drew Slager (P 72941) 28225 Mound Rd. Warren, MI 48092 586-751-3900		This case has been designated as an eFiling case, for more information please visit www.oakgov.com/efiling .

Instructions: Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (form MC 21). The summons section will be completed by the court clerk.

Domestic Relations Case

There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (form MC 21) listing those cases.

It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

Civil Case

This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.

MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).

There is no other pending or resolved case arising out of the same transaction or occurrence as alleged in the complaint.

A civil action between these parties or others arises arising out of the transaction or occurrence alleged in the complaint has been previously filed in this court, _____ Court, where

it was given case number _____ and assigned to Judge _____

The action remains is no longer pending.

Summons section completed by court clerk.

SUMMONS

NOTICE TO THE DEFENDANT: In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to file a written answer with the court and serve a copy on the other party or take other lawful action with the court (28 days if you were served by mail or you were served outside this state).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date 4/28/2021	Expiration date* 07/28/2021	Court clerk Lisa Brown
-------------------------	--------------------------------	---------------------------

*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

SUMMONS

Case No. 2021-187679-NQ

TO PROCESS SERVER: You are to serve the summons and complaint not later than 91 days from the date of filing or the date of expiration on the order for second summons. You must make and file your return with the court clerk. If you are unable to complete service you must return this original and all copies to the court clerk.

CERTIFICATE / AFFIDAVIT OF SERVICE / NONSERVICE **OFFICER CERTIFICATE****OR** **AFFIDAVIT OF PROCESS SERVER**

I certify that I am a sheriff, deputy sheriff, bailiff, appointed court officer, or attorney for a party (MCR 2.104[A][2]), and that: (notarization not required)

Being first duly sworn, I state that I am a legally competent adult, and I am not a party or an officer of a corporate party (MCR 2.103[A]), and that: (notarization required)

I served personally a copy of the summons and complaint,
 I served by registered or certified mail (copy of return receipt attached) a copy of the summons and complaint,

together with

List all documents served with the summons and complaint

on the defendant(s):

Defendant's name	Complete address(es) of service	Day, date, time

I have personally attempted to serve the summons and complaint, together with any attachments, on the following defendant(s) and have been unable to complete service.

Defendant's name	Complete address(es) of service	Day, date, time

I declare under the penalties of perjury that this proof of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Service fee \$	Miles traveled \$	Fee \$	
Incorrect address fee \$	Miles traveled \$	Fee \$	TOTAL FEE \$

Signature

Name (type or print)

Title

Subscribed and sworn to before me on _____, County, Michigan.
 Date _____

My commission expires: _____ Signature: _____
 Date _____ Deputy court clerk/Notary public

Notary public, State of Michigan, County of _____

ACKNOWLEDGMENT OF SERVICE

I acknowledge that I have received service of the summons and complaint, together with _____ Attachments

on _____ Day, date, time _____

on behalf of _____

Signature

This case has been designated as an eFiling case, for more information please visit www.oakgov.com/efiling.

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF OAKLAND

JOSEPHINE SLAPPEY,

Plaintiff,

-vs-

TARGET CORPORATION,

Defendant.

2021-187679-NO

Case No. 2021- -NO
HONJUDGE DANIEL P. O'BRIEN

MANCINI SCHREUDER KLINE P.C.
DREW SLAGER (P 72941)
Attorneys for Plaintiff
28225 Mound Road
Warren, Michigan 48092-3498
(586) 751-3900/(586) 751-7203 fax
dslager@mancini-law.com
lsloan@mancini-law.com

There is no other pending or resolved civil action arising out of the transaction or occurrence alleged in the complaint.

COMPLAINT AND DEMAND FOR JURY TRIAL

NOW COMES the Plaintiff JOSEPHINE SLAPPEY by and through her attorneys, Mancini Schreuder Kline P.C., and for her Complaint against Defendant TARGET CORPORATION states as follows:

1. Plaintiff is a resident of the City of Livonia, County of Oakland, State of Michigan.
2. Defendant TARGET CORPORATION is a foreign profit corporation and at all relevant times was doing business in the City of Farmington Hills, County of Oakland, State of Michigan.
3. The amount in controversy herein exceeds the sum of Twenty-Five Thousand (\$25,000.00) Dollars exclusive of costs, interest and attorney fees.
4. On or about the 10th day of November, 2018, Plaintiff JOSEPHINE SLAPPEY visited Defendant's store at 30200 Grand River Ave in the City of Farmington Hills, County of Oakland, State of Michigan, intending to purchase various items.

5. At the said time and place, as Plaintiff approached the front door of Defendant's store, a TARGET CORPORATION employee struck Plaintiff with a line of shopping carts he was propelling with a motorized cart, causing injuries set forth below.

6. Defendant had the following duties to Plaintiff:

- a. to exercise ordinary care and caution for Plaintiff's safety and the safety of others;
- b. to avoid acts and omissions which might cause or compound injury to Plaintiff;
- c. to refrain from irresponsible and negligent conduct; and
- d. to meet other duties as specified by law, ordinance, standard, and custom.

7. Defendant, through its own actions and those of its employee acting in the course of his employment, breached these duties when they performed the following acts of negligence:

- a. choosing not to use due caution for the safety of Plaintiff and others in the area in the course of his work;
- b. striking Plaintiff with the train of carts he was pushing;
- c. choosing not to check for pedestrians and otherwise check his surroundings adequately;
- d. choosing not to warn Plaintiff prior to striking her with the carts;
- e. choosing not to adequately train employees in the safe and proper operation of workplace duties; and
- f. otherwise breaching duties owed by law.

8. As a direct and proximate result of Defendant's negligence and breach of duties, Plaintiff suffered injuries, including but not limited to:

- a. serious injuries to her back, and related and resultant injuries;
- b. disability and disfigurement;
- c. fright, fear, embarrassment, humiliation, mortification;
- d. post traumatic stress disorder;

- e. pain and suffering;
- f. loss of earnings and earning capacity;
- g. medical expenses, past and future;
- h. denial of social pleasures and enjoyment of the usual activities of life; and
- i. other damages allowed by law.

WHEREFORE, Plaintiff requests an award of damages against Defendant in whatever amount in excess of Twenty-Five Thousand (\$25,000.00) Dollars to which she may be found entitled, together with costs, interest and attorney fees so wrongfully incurred.

PLAINTIFF HEREBY DEMANDS A TRIAL BY JURY.

MANCINI SCHREUDER KLINE P.C.

By: /s/ Drew Slager
DREW SLAGER (P 72941)
Attorneys for Plaintiff
28225 Mound Road
Warren, Michigan 48092-3498
(586) 751-3900

Dated: April 28, 2021

EXHIBIT B

EXHIBIT B

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF OAKLAND

JOSEPHINE SLAPPEY,

Plaintiff,

Case No: 2021-187679-NO
Hon. Judge Daniel P. O'Brien

-vs-

TARGET CORPORATION,

Defendant.

DREW SLAGER (P72941)
MANCINI SCHREUDER KLINE P.C.
Attorneys for Plaintiff
28225 Mound Road
Warren, MI 48092-3498
(586) 751-3900 | (586) 751-7203 (fax)
dslager@mancini-law.com
lsloan@mancini-law.com

KENNETH P. WILLIAMS (P55790)
SEGAL, McCAMBRIDGE SINGER & MAHONEY
Attorneys for Defendant
29100 Northwestern Hwy., Suite 240
Southfield, MI 48034
(248) 994-0060 | (248) 994-0061 (fax)
kwilliams@smsm.com

APPEARANCE, NOTICE OF APPEARANCE AND PROOF OF SERVICE

TO: CLERK OF THE COURT

PLEASE ENTER THE APPEARANCE of the undersigned as attorney for the Defendant,
TARGET CORPORATION, a Minnesota corporation, in the above-entitled matter.

SEGAL McCAMBRIDGE SINGER & MAHONEY

By: /s/ Kenneth P. Williams
KENNETH P. WILLIAMS (P55790)
Attorneys for Defendant
29100 Northwestern Hwy., Suite 240
Southfield, MI 48034
248-994-0060

Dated: May 25, 2021

NOTICE OF APPEARANCE

TO: DREW SLAGER (P72941)
Mancini Schreuder Kline P.C.
Attorneys for Plaintiff

PLEASE TAKE NOTICE that I have this day caused my appearance to be entered as attorney for defendant, TARGET CORPORATION, in the above-entitled matter.

SEGAL McCAMBRIDGE SINGER & MAHONEY

By: /s/ Kenneth P. Williams
KENNETH P. WILLIAMS (P55790)
Attorneys for Defendant
29100 Northwestern Hwy., Suite 240
Southfield, MI 48034
248-994-0060

Dated: May 25, 2021

PROOF OF SERVICE - EFILE

I hereby certify that on May 25, 2021, I electronically filed the foregoing document and Proof of Service via MiFILE which will electronically send notification of such filing to all counsel of record.

/s/ Kimberly Ollila
KIMBERLY OLLILA